

**Before the  
MASSACHUSETTS DEPARTMENT OF  
TELECOMMUNICATIONS AND ENERGY**

Inquiry by the Department of Telecommunications and	)	
and Energy Pursuant to Section 271 of the	)	
Telecommunications Act of 1996 into the Compliance	)	
Filing of New England Telephone and Telegraph	)	Docket No. 99-271
Company d/b/a Bell Atlantic-Massachusetts as Part of its	)	
Application to the Federal Communications Commission	)	
for Entry into the In-Region InterLATA (Long Distance)	)	
Telephone Market	)	

**COMMENTS OF  
THE COMPETITIVE TELECOMMUNICATIONS ASSOCIATION  
ON THE MOTION FOR A COMMERCIAL OSS AVAILABILITY PERIOD**

The Competitive Telecommunications Association ("CompTel") hereby responds to the Department's April 4, 2000, Memorandum in the above-referenced proceeding requesting comments on AT&T's Motion to Adjust the Master Test Plan and Clarify the Procedural Schedule.

CompTel supports AT&T's motion to include a 90-day "commercial availability period" for Bell Atlantic-Massachusetts' ("BA-MA's") operations support systems ("OSS") following the conclusion of KPMG's testing. Indeed, CompTel urged the Department to require such a commercial usage period in both CompTel's July 1999 comments on BA-MA's May 1999 "Compliance Filing" and CompTel's October 1999 comments on KPMG's draft Master OSS Test Plan. Specifically, CompTel urged the Department in those comments "to require BA-MA to provide

the Department with data from at least four months of actual commercial usage of its OSS in Massachusetts" following the completion of the OSS testing. <sup>1/</sup>

As CompTel stated in those comments, such a requirement is essential because "without such data, the Department will have no way of ensuring that BA-MA's OSS provides competitors with access to its network at parity with the access that BA-MA provides to itself and its competitors when dealing with real customers, at commercial volumes, and over live lines." <sup>2/</sup> "In addition, such data is necessary to ensure that the OSS Bell Atlantic provides to competitors is operable equally for both large and small carriers." <sup>3/</sup>

The experiences in New York and Texas highlight the need for data from actual commercial usage of BA-MA's OSS. Each of those states issued positive recommendations on Bell Atlantic's and Southwestern Bell's Section 271 applications, respectively, despite OSS problems that continued, and in some cases worsened, after the recommendations were issued. <sup>4/</sup> In each case, third party

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<sup>1/</sup> CompTel Comments on BA-MA's May 24, 1999, "Compliance Filing" (filed July 16, 1999) ("CompTel July 1999 Comments"), at 12-13; CompTel Comments on KPMG's Draft Master Test Plan (filed October 14, 1999) ("CompTel October 1999 Comments"), at 8, 9 ("It is also essential that, following successful completion of such third-party tests, Bell Atlantic be required to provide several months of data from actual commercial usage.").

<sup>2/</sup> CompTel July 1999 Comments at 13-14.

<sup>3/</sup> CompTel October 1999 Comments at 8.

<sup>4/</sup> See New York Public Service Commission Case Nos. 00-C-0008, 00-C-0009, Order Directing Improvements to Wholesale Service Performance (Feb. 11, 2000); see also "Statement of FCC Chairman William e. Kennard on SBC 271 Filing," News Release (rel. April 3, 2000).

testing – while important – did not adequately address or lead to the resolution of critical OSS problems. Requiring data from actual commercial usage of BA-MA's OSS following the successful completion of the OSS testing would help the Department determine, *before* issuing a recommendation on BA-MA's Section 271 application, whether the OSS that BA-MA provides to competitors is actually capable of handling commercial order volumes at parity with BA-MA's own OSS under real-world conditions. In addition, such data would help BA-MA identify and correct any remaining problem areas in its OSS.

For these reasons, the Commission should grant AT&T's motion, join the Pennsylvania Public Utilities Commission, and require BA-MA to provide at least three months of data from actual commercial usage of its OSS following the completion of KPMG's OSS testing.

Respectfully submitted,

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